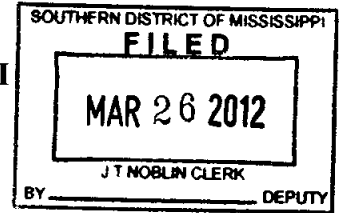


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



TROUT POINT LODGE, LIMITED,)
A Nova Scotia Limited Company;)
VAUGHN PERRET and)
CHARLES LEARY,)

Plaintiff,)

v.)

DOUG K. HANDSHOE,)

Defendant.)

Civil Action No.: 1:12cv9016-JMR

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 *et seq.*, Defendant, Doug K. Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and states as follows:

1. On March 8, 2012, Plaintiffs' filed their Motion to Enroll Foreign Judgment in the lawsuit styled *Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe*, Civil Action No. 12-0103, in the Circuit Court of Hancock County, Mississippi.

2. The Defendant, Doug K. Handshoe, was served with notice of such filing on or about March 9, 2012.

3. Removal is proper under 28 U.S.C. § 4103, because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via the internet by Defendant in securing rendition of a foreign judgment against Defendant in the Supreme Court of Nova

Scotia, Canada on or about February 2, 2012; and in response thereto Defendant has filed his suit in this Court, styled *Slabbed New Media, LLC, a Mississippi LLC, Douglas Handshoe vs. Trout Point Lodge, Limited, a Foreign Limited Company; Charles Leary and Vaughn Perret*, Civil Action No. 1:12-CV-00038-RHW, filed in the United States District Court for the Southern District of Mississippi, Southern Division, under the provisions of the Securing The Protection Of Our Enduring and Established Constitutional Heritage Act, pursuant to 28 U.S.C. Sections 4101, *et seq.*

4. Venue is proper in this district under 28 U.S.C. § 1441(a) because the State Court where the action has been pending is located in this district.

5. This Notice is being filed with this Court within thirty (30) days after Defendant received a copy of Plaintiffs' initial pleading, Motion to Enroll Foreign Judgment.

6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above described State Court action are attached hereto as Exhibit "A"; and that no other process, pleadings, or orders have been served upon Defendant to date in this action.

7. Defendant files this Notice without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.

8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which it may be justly entitled.

DATED: March 23, 2012

Respectfully Submitted,



G. GERALD CRUTHIRD, Esquire

Mississippi Bar No. 7926

G. GERALD CRUTHIRD, P.A.

Attorneys at Law

P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220

Facsimile: (601) 798-4591

Email: ggeraldc@bellsouth.net

CO-COUNSEL FOR DEFENDANT

JACK E. "BOBBY" TRUITT, Esquire

The Truitt Law Firm, L.L.C.

149 North New Hampshire Street

Covington, LA 70433-3235

Telephone: (985) 327-5266

Facsimile: (985) 327-5252

Mobile: (985) 778-1973

Email: btruitt@truittlaw.com

**CO-COUNSEL FOR DEFENDANT,
APPEARING PRO HAC VICE**

CERTIFICATE OF SERVICE

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Defendant's Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, LLP
2510 14th Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516
Email: hlaird@joneswalker.com
Attorneys for Plaintiff

and have hand delivered a true and correct copy unto

Karen Ladner Ruhr
Circuit Clerk of Hancock County, Mississippi
152 Main Street, Suite B
Bay St. Louis, MS 39520

THIS the 26th day of March, 2012.



G. GERALD CRUTHIRD